

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION

DEIRDRE YOUNG,)	
)	
Plaintiff,)	
)	
v.)	
)	
WASHINGTON GAS LIGHT)	Civil Case No. 1:23-cv-00445-PTG-JFA
COMPANY,)	
)	
and)	
)	
TEMPORARY SOLUTIONS, INC.,)	
)	
Defendants.)	

THE PARTIES' JOINT PROPOSED RULE 16 DISCOVERY PLAN

COME NOW Plaintiff Deirdre Young ("Plaintiff"), Defendant Washington Gas Light Company d/b/a Washington Gas ("Washington Gas"), and Defendant Temporary Solutions, Inc. ("Temporary Solutions"), by and through undersigned counsel, and pursuant to the Court's Order (Docket No. 22) and Rule 16 of the Federal Rules of Civil Procedure, file the following proposed Rule 16 Discovery Plan:

1. On October 27, 2023, the parties conferred prior to the initial pretrial conference to consider the claims, defenses, possibilities of a prompt settlement or resolution of the case, trial before a Magistrate Judge, to arrange for the disclosures required by Rule 26(a)(1), and to develop a discovery plan which will complete discovery by February 16, 2024. The parties agree with the proposed Discovery Plan described below.

2. The parties do not wish to proceed before a United States Magistrate Judge.

3. The parties agree that they will make their Rule 26(a)(1) Disclosures on or before November 15, 2023.

4. The parties agree that the deadline to file any allowable amended pleadings shall be November 29, 2023.

5. The parties agree that each party may not exceed more than five (5) non-party, non-expert witness depositions, and that the parties will observe the limitations set forth in the Court's Scheduling Order and those contained in the Federal Rules of Civil Procedure and the Local Rules for the Eastern District of Virginia.

6. The parties agree that, pursuant to Fed. R. Civ. P. 26(a)(2), Plaintiff will serve disclosures of expert testimony no later than December 27, 2023, and Washington Gas and Temporary Solutions will serve disclosures of expert testimony no later than January 24, 2024. The parties agree that, pursuant to Fed. R. Civ. P. 26(a)(2), Plaintiff will serve disclosures of expert rebuttal evidence no later than February 7, 2024.

7. The parties discussed the discovery of electronic materials. In addition to incorporating by reference applicable Federal Rules of Civil Procedure governing the same, if electronically stored information is requested by a party, such information will be produced in a usable form and format as agreed by the parties, except that metadata will not be produced unless so requested by a party with respect to a specific document or file.

8. The parties may confer on the terms of an agreed confidentiality order that may be deemed necessary to protect confidential information which may be exchanged in the course of discovery. The parties will timely file the appropriate motion with the Court for approval of same.

9. The parties agree that all dispositive motions shall be filed on or before March 29, 2024.

10. The parties agree to service by mail or electronic mail, and agree that electronic mail will be the primary means of service.

11. The parties agree that they shall discuss all other items required to be discussed by Rule 26(f) within ten days of issuance of the Court's Order with regard to this proposed discovery plan.

12. The parties request that the Court adopt this proposed discovery plan and excuse the parties from attending the November 8, 2023 pre-trial conference.

DATED: October 27, 2023

Respectfully submitted,

By: /s/Monique A. Miles

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CERTIFICATE OF SERVICE

The undersigned does hereby certify that a true and exact copy of the foregoing was filed via ECF and was electronically served upon the following counsel on October 27, 2023.

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